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Pro Se Claimant and

Party to California Public Utilities Commission Proceeding I.15-08-019 to Determine whether Pacific Gas and Electric Company and PG&E's Corporation's Organizational Culture and Governance Prioritizes Safety

Party to California Public Utilities Commission Proceeding A.20-06-011 which is the Application of Pacific Gas and Electric Company for Approval of Regionalization Proposal

Party to California Public Utilities Commission Proceeding R.18-10-007 which is the Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

**DECLARATION OF WILLIAM B.
ABRAMS IN SUPPORT OF WILLIAM
B. ABRAMS MOTION TO ENFORCE
DISCLOSURE REQUIREMENTS OR
RECONSTITUTE THE FIRE VICTIM
TRUST OVERSIGHT COMMITTEE
GIVEN NEW EVIDENCE OF SELF
DEALING AND CONFLICTS OF
INTEREST PURSUANT TO U.S.C. §§
327(a) AND BANKRUPTCY RULE 2014**

Related Documents: Dkt. 11005

No response is required until the court
determines whether to permit further
consideration of the motion

1 I, William B. Abrams, pursuant to section 1746 of title 28 of the United States Code,
2 hereby declare under penalty of perjury that the following is true and correct to the best of my
3 knowledge, information, and belief:

4 1. I am a claimant and a PG&E Fire Survivor who has engaged in this proceeding as a
5 Pro Se party to promote and collaborate with core parties in good-faith towards a viable plan, Trust
6 Agreement and Trust oversight process that provides just settlements for all claimants and provides
7 adequate restructuring for Pacific Gas and Electric Corporation so our communities are safer and
8 more secure.

9 2. After the PG&E Fires of 2017, I felt compelled to engage as a party to certain
10 proceedings at the California Public Utilities Commission to work collaboratively towards solutions
11 that address wildfire mitigation and other utility/energy issues. Some of these proceedings are related
12 to this case. All of my filed comments are in the public record through the Commission's website.
13 As an intervenor in these proceedings, I have received some compensation from Investor Owned
14 Utilities including Pacific Gas and Electric Corporation.

15 3. I have no financial interests in this case that are adverse to those of victims. I have no
16 litigation financing or lines of credit tied to PG&E shareholders, bondholders or any other party in
17 this case. I have not and do not intend to get any compensation for my involvement in this case other
18 than through my victim claim and those claims of my family. I have not engaged in activities to
19 undermine the value of the Fire Victim Trust or to slow the Trust Administration process.

20 4. I believe that approval of the Motion for TOC Disclosures as described therein is
21 critical to restore trust in the oversight of the Victim Trust and the claims administration processes. I
22 have requested a hearing at the earliest convenience of the court so that conflicts of interest and self-
23 dealing will be exposed to ensure just and prompt processing of claims through the Fire Victim Trust.

24 5. I have referenced only some of the pertinent actions of the Up From the Ashes
25 Coalition and TOC members related to my motion and relevant to the conflicts of interest in this case
26 and the disclosures required by bankruptcy code. Additional information provided to me by other
27 PG&E victims and certain stakeholders has not been included in my filed motion. I understand that
28 other stakeholders and certain core parties to this case are bound by nondisclosure agreements and/or
other agreements that may prevent their engagement in these issues.

1 6. I have included some of the relevant documents and described some of the first-hand
2 accounts pertinent to the Motion for TOC Disclosures in the hopes that this motion will be approved
3 by the court and/or a hearing will be set to provide additional context for the court to consider.

4 7. I submit this declaration in support of this Motion (the “**Motion for TOC**
5 **Disclosures**”), pursuant to Rule 9006-1 of the Bankruptcy Local Rules for United States District
6 Court for the Northern District of California (the “Bankruptcy Local Rules”) and in response to the
7 special “preliminary review” ordered by the court. I respectfully request that the court enters an order
8 and schedules a hearing on the “WILLIAM B. ABRAMS MOTION TO ENFORCE DISCLOSURE
9 REQUIREMENTS OR RECONSTITUTE THE FIRE VICTIM TRUST OVERSIGHT
10 COMMITTEE GIVEN NEW EVIDENCE OF SELF DEALING AND CONFLICTS OF INTEREST
11 PURSUANT TO U.S.C. §§ 327(a) AND BANKRUPTCY RULE 2014” (“**Motion for TOC**
12 **Disclosures**”) [Dkt. 11005] , filed on August 2, 2021.¹

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17 I declare under penalty of perjury that, to the best of my knowledge and after reasonable
18 inquiry, the foregoing is true and correct and that this declaration was executed at Santa Rosa,
19 California on August 2, 2021.

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23 _____
24 William B. Abrams
25 Pro Se Claimant
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¹ Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion to Designate
Votes or the Motion to Shorten, as applicable.